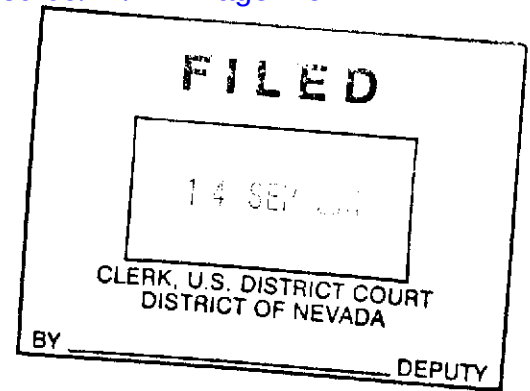


1 DANIEL G. BOGDEN
United States Attorney
2 NANCY J. KOPPE
ROGER YANG
3 Assistant United States Attorneys
333 Las Vegas Blvd South, Suite 5000
4 Las Vegas, Nevada 89101
(702) 388-6336



6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9 UNITED STATES OF AMERICA,

10 PLAINTIFF,

11 VS.

12 TRAVONE FRANKLIN, and
TYRICKA MIDDLETON,

13 DEFENDANTS.
14

CRIMINAL INDICTMENT

2:11-cr- 340

Violations:

18 U.S.C. 2423(a) - Transportation of
Minor for Prostitution

18 U.S.C. 1591 - Sex Trafficking of
Children

18 U.S.C. 2 - Aiding and Abetting.

16 THE GRAND JURY CHARGES THAT:

17 **COUNT ONE**

Transportation of Minor for Prostitution

19 On or about July 26, 2011, in the State and Federal District of Nevada and
20 elsewhere,

21 TRAVONE FRANKLIN and
TYRICKA MIDDLETON,

22 defendants herein, did knowingly transport an individual, that is, "B," a minor, who was at that
23 time under the age of 18 years, in interstate commerce from California, to Las Vegas,
24 Nevada, with intent that such individual engage in prostitution and sexual activity for which
25
26

1 any person can be charged with a criminal offense, all in violation of Title 18, United States
2 Code, Sections 2423(a) and 2.

3 **COUNT TWO**
4 Sex Trafficking of Children

5 On or about July 26, 2011, in the State and Federal District of Nevada and
6 elsewhere,

7 **TRAVONE FRANKLIN and**
8 **TYRICKA MIDDLETON,**

9 defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice,
10 harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate
11 commerce, "B," a minor, knowing that said person would be caused to engage in commercial
12 sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

13 **COUNT THREE**
14 Transportation of Minor for Prostitution

15 On or about July 26, 2011, in the State and Federal District of Nevada and
16 elsewhere,

17 **TRAVONE FRANKLIN and**
18 **TYRICKA MIDDLETON,**

19 defendants herein, did knowingly transport an individual, that is, "D," a minor, who was at
20 that time under the age of 18 years, in interstate commerce from California, to Las Vegas,
21 Nevada, with intent that such individual engage in prostitution and sexual activity for which
22 any person can be charged with a criminal offense, all in violation of Title 18, United States
23 Code, Sections 2423(a) and 2.

24 . . .

25 . . .

26 . . .

COUNT FOUR
Sex Trafficking of Children

On or about July 26, 2011, in the State and Federal District of Nevada and elsewhere,

TRAVONE FRANKLIN and
TYRICKA MIDDLETON,

defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, "D," a minor, knowing that said person would be caused to engage in commercial sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

COUNT FIVE
Transportation of Minor for Prostitution

On or about August 16, 2011, in the State and Federal District of Nevada and elsewhere,

TRAVONE FRANKLIN and
TYRICKA MIDDLETON,

defendants herein, knowingly transported an individual, that is, "B," a minor, who was at that time under the age of 18 years, in interstate commerce from California, to Las Vegas, Nevada, with intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SIX
Sex Trafficking of Children

On or about August 16, 2011, in the State and Federal District of Nevada and elsewhere,

1 **TRAVONE FRANKLIN and**
2 **TYRICKA MIDDLETON,**

3 defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice,
4 harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate
5 commerce, "B," a minor, knowing that said person would be caused to engage in commercial
6 sex acts, all in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

7 **DATED:** this 14 day of September, 2011.

8 **A TRUE BILL:**

9
10 /S/
11 **FOREPERSON OF THE GRAND JURY**

12 **DANIEL G. BOGDEN**
13 **United States Attorney**

14 
15 **NANCY J. KORPE**
16 **ROGER YANG**
17 **Assistant United States Attorneys**